

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

U.S. EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)
)
Plaintiff,) Case No. 16-cv-00842-WMS-HBS
)
)
v.)
)
UPSTATE NIAGARA COOPERATIVE, INC.,)
)
Defendant.)
_____)

JOINT MOTION TO APPROVE CONSENT DECREE

Having engaged in comprehensive settlement negotiations and having agreed that the above-captioned action should be resolved by entry of the proposed consent decree attached to this motion, for the reasons stated therein, Plaintiff United States Equal Employment Opportunity Commission and Defendant Upstate Niagara Cooperative, Inc. jointly move that this Court enter the attached Consent Decree.

WHEREFORE, the parties jointly request that the Court grant the motion.

Respectfully Submitted,

Dated: January 15, 2020

/s/Sebastian Riccardi
Sebastian Riccardi, Senior Trial Attorney
Jadhira Rivera, Senior Trial Attorney
Justin Mulaire, Supervisory Trial Attorney
Jeffrey Burstein, Regional Attorney
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
Attorney for Plaintiff
33 Whitehall St. Fl. 5
New York, NY 10004
Tel: (929) 506-5340
Fax: (212) 336-3623
Sebastian.Riccardi@eeoc.gov
Jadhira.Rivera@eeoc.gov
Justin.Mulaire@eeoc.gov
Jeffrey.Burstein@eeoc.gov

Robert C. Weissflach, Partner
Amy Hemenway, Partner
Harter Secrest & Emery LLP
50 Fountain Plaza, Suite 1000
Buffalo, NY 14202
Tel: (716) 844-3707
Fax: (716) 853-1617
rweissflach@hselaw.com
ahemenway@hselaw.com